REMARKS

This responds to the Office Action mailed on August 30, 2005, and the references cited therewith.

Claims 1, 4, 6, 9, 11 and 14 are amended, claims 2, 3, 7, 8, 12 and 13 are canceled, and no claims are added; as a result, claims 1, 4-6, 9-11 and 14-15 remain pending in this application.

§102 Rejection of the Claims

Claims 1-15 were rejected under 35 U.S.C. § 102(b) for anticipation by Schimmel (US 6,105,113). Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. *In re Dillon* 919 F.2d 688, 16 USPQ 2d 1897, 1908 (Fed. Cir. 1990) (en banc), cert. denied, 500 U.S. 904 (1991). It is not enough, however, that the prior art reference discloses all the claimed elements in isolation. Rather, "[a]nticipation requires the presence in a single prior reference disclosure of each and every element of the claimed invention, *arranged as in the claim.*" *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983)) (emphasis added). Applicant respectfully submits that Schimmel does not anticipate Applicant's pending claims because Schimmel does not teach each and every element of Applicant's claims as amended.

For example, each of independent claims 1, 6, and 11 as amended recite "mapping the virtual node to a physical node." In the rejection of now canceled claim 3, the Office Action states that Schimmel discloses the recited language, indicating that "figures 5-8 show the mapping between virtual entities and physical entities". Applicant notes that neither Applicant's claims nor Schimmel use the phrase "virtual entities." Schimmel does refer to mapping virtual memory to physical memory, as does Applicant's specification and claims. As part of the system and methods claimed, Applicant's claims 1, 6 and 11 recite mapping a virtual node to a physical node. Nowhere does Schimmel refer to mapping a virtual node to a physical node. Applicant has thoroughly reviewed Schimmel, including performing a computerized text search, and can find no teaching, disclosure, or use of the term "virtual node" or its equivalents. As a result, Schimmel does not teach mapping virtual nodes to physical nodes. Thus Schimmel does

not anticipate Applicant's claims 1, 6 and 11. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 1, 6 and 11.

Claims 4-5 depend from claim 1, claims 9-10 depend from claim 6, and claims 14-15 depend from claim 11. Each of these dependent claims inherits the elements of their respective base claims while adding further patentable elements. Claims 4-5, 9-10, and 14-15 are therefore not anticipated by Schimmel for the same reasons as discussed above regarding their respective base claims. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 4-5, 9-10, and 14-15.

Additionally, claims 4, 9 and 14 each recite "an ERTT header located at a well known location to one or more nodes used by an application to provide the mapping from the virtual node to the physical node." As discussed above, Schimmel does not teach or disclose mapping a virtual node to a physical node, thus Schimmel cannot teach or disclose an ERTT header that specifies such a mapping. The Office Action asserts that Schimmel teaches the recited language, stating:

> figures 5-8 show the page tables and translation tables to facilitate the mapping between virtual entities and physical entities, figure 9 shows the steps of accomplishing the mapping; abstract; column 7, lines 50-67; column 81.

Applicant again notes Schimmel does not use the term "virtual entity", rather Schimmel discusses mapping virtual memory to physical memory. Further, nowhere in the cited sections or figures does Schimmel teach an ERTT header that provides a mapping of virtual nodes to physical nodes. As a result, Schimmel does not teach each and every element of claims 4, 9 and 14. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 4, 9 and 14.

Claims 5, 10 and 15 recite that the "the ERTT header is located on a predetermined virtual node". As discussed above, Schimmel does not teach an ERTT header, and thus Schimmel cannot teach or disclose anything related to the location of the ERTT header. As a result, Schimmel does not teach each and every element of claims 5, 10 and 15. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 5, 10 and 15.

Claims 1-15 were rejected under 35 U.S.C. § 102(e) for anticipation by Scott (US 2004/0044872). Applicant respectfully submits that Scott does not anticipate Applicant's

pending claims because Scott does not teach each and every element of Applicant's claims as amended.

For example, each of independent claims 1, 6, and 11 as amended recite that the ERTT segment resides in a generally accessible memory. In the rejection of now canceled claim 2, the Office Action merely states that paragraph 19 of Scott teaches an ERTT table in a generally accessible memory. The Office Action does not identify which of the many elements discussed in paragraph 19 might correspond to the ERTT of Applicant's claims. For the purposes of this response, Applicant will assume that the RTT discussed in Scott was the element intended to correspond to the claimed ERTT. As made clear in FIG. 6 and paragraphs 26 and 39, the RTT resides on a memory controller chip, and not in generally accessible memory. As a result, the RTT of Scott is not an ERTT in a generally accessible memory. Applicant has reviewed Scott and can find no teaching of an ERTT in a generally accessible memory. As a result, Scott does not teach each and every element of Applicant's claims 1, 6, and 11. Therefore Scott does not anticipate Applicant's claims 1, 6 and 11. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 1, 6 and 11.

Claims 4-5 depend from claim 1, claims 9-10 depend from claim 6, and claims 14-15 depend from claim 11. Each of these dependent claims inherits the elements of their respective base claims while adding further patentable elements. Claims 4-5, 9-10, and 14-15 are therefore not anticipated by Scott for the same reasons as discussed above regarding their respective base claims. Applicant respectfully requests reconsideration and the withdrawal of the rejection of claims 4-5, 9-10, and 14-15.

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CONCLUSION

Applicant respectfully submits that the claims are in condition for allowance, and notification to that effect is earnestly requested. The Examiner is invited to telephone Applicant's attorney at (612) 373-6954 to facilitate prosecution of this application.

If necessary, please charge any additional fees or credit overpayment to Deposit Account No. 19-0743.

Respectfully submitted,

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